



# KINGS COUNTY REPUBLICAN COUNTY COMMITTEE

HON. ARTHUR BRAMWELL  
Chairman

HON. DIANE H. RUDIANO  
1st Vice Chairman

HON. MICHELE HEITZNER  
2nd Vice Chairman

HON. ELIZABETH A. BONINA  
3rd Vice Chairman

HON. GERALD M. O'BRIEN  
Secretary

GEORGE M. COFFINAS, ESQ.  
Assistant Secretary

CARMINE EVANGELISTA, C.P.A.  
Treasurer

CHARLES D'ARCY  
Sergeant-at-Arms

HON. STEVEN J. DORN  
Law Chairman

MARK E. UNCAPHER  
Finance Chairman

HON. RONALD J. D'ANGELO  
Executive Chairman

HON. GLADYS PEMBERTON  
Executive Secretary

HON. FRANCIS J. VOYTICKY  
Assistant Executive Secretary

The Honorable John Warren McGarry  
Chairman  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: MUR 4648

Dear Chairman McGarry:

On behalf of the Kings County Republican Committee ("KCRC"), this will respond to the Factual and Legal Analysis from the Federal Election Commission in this matter.

As an initial matter, we are unsure how and why the KCRC can even come under the jurisdiction of the Federal Election Committee. The KCRC is a county party committee created under N.Y. Elec. Code §§ 2-100 and 2-104. The KCRC is registered with the New York Board of Elections in Albany and the New York City Board of Elections. The KCRC files regular reports of contributions and disbursements with those entities as required by New York law.

The KCRC is the party committee for Kings County, New York, which is the Borough of Brooklyn. We are active in elections for state and local offices. The KCRC does not have a federal account because we do not participate in federal elections.

Furthermore, the Factual and Legal Analysis is in error. The check to the KCRC from the New York Republican State committee is dated November 7, 1994, the day before the election, not November 9, 1994 as stated in the Factual and Legal Analysis. A copy of the check is attached. I cashed the check on election day - November 8, 1994. The funds were used for election day activities such as buying meals for poll watchers and volunteers, and paying similar costs associated with challenges to a large number of uncounted and unopened ballots found the day after the election, and for the recount of the state Attorney General's election.

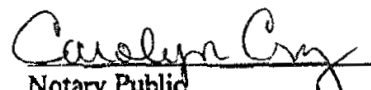
In conclusion, the KCRC did not "advance" any funds to the New York Republican State Committee prior to the 1994 election. Therefore, the KCRC did not make any "expenditure" as defined in the Federal Election Campaign Act, did not become a "political committee" under federal law, was not required to file a Statement of Organization and did not make any "contribution" under federal law, including one that contained prohibited funds.

Accordingly, this matter against the Kings County Republican Committee and its treasurer should be dismissed.

Sincerely,

  
Arthur Bramwell  
Chairman

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of August, 1997.

  
Notary Public

My Commission Expires: August 31, 1999

CAROLYN CRUZ  
Notary Public, State of New York  
No. 41 433/583  
Qualified in Queens County  
Commission Expires Aug. 31, 1999

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# NEW YORK REPUBLICAN STATE COMMITTEE

ALLOCATION ACCOUNT  
315 STATE STREET  
ALBANY, NY 12210

EXPLANATION	AMOUNT
672	

3329

29-7-213

PAY AMOUNT OF *FIVE THOUSAND DOLLARS*

DOLLARS

CHECK AMOUNT

\$5000 *00*

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NUMBER
11/14/11	Kings County Rep Comm		

111011

*Michael J. Brown*

KEY BANK OF NEW YORK  
PARK OFFICE ALBANY, NY 12210

⑈003329⑈ ⑈021300077⑈ 511 000635 9⑈ ⑈0000500000⑈

Kings County  
Rep. Committee  
Arthur Bramwell

2000 50  
2000 20  
1000 10

0012.1 11/08/94 11/08/94  
CASH OUT 6,500.00  
FOREIGN CHK CASH \$5,000.00  
89023 116 83 COURT STREET

62000017

PROCESSED BY 11/08/94 FLEET BANK  
NEWSTEAD, N.Y. 11766  
PAYOR BANK 11/08/94 62000017  
0300869230

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of the Kings County                    )  
Republican Committee                                    )                   MUR 4648

**RESPONSES TO QUESTIONS AND PRODUCTION OF DOCUMENTS**

**1. Identify all officers and employees of the Kings County Republican Committee. State the purpose of the Kings County Republican Committee. Describe the relationship between the Kings County Republican Committee and Dorn & Associates, P.C.**

**Response to Question 1:**

The officers of the Kings County Republican Committee are: Arthur Bramwell, chairman; Diane H. Rudiano, 1st vice chairman; Michele Heitzner, 2nd vice chairman; Elizabeth A. Bonina, 3rd vice chairman; Gerald M. O'Brien, secretary; George M. Coffinas, assistant secretary; Carmine Evangelisgta, treasurer; Charles D'Arcy, sergeant-at-arms; Steven J. Dorn, law chairman; Mark E. Uncapher, finance chairman; Ronald J. D'Angelo, executive chairman; Gladys Pemberton, executive secretary, and Francis J. Voyticky, assistant executive secretary.

There are no employees.

The organization's purpose is to carry out the duties and activities of the Republican Party in Kings County, New York.

There is no relationship between the Kings County Republican Committee and Dorn & Associates, P.C. The two are in the same suite of offices, and each is a subleasee from Debcorp. Management Corporation. Steven J. Dorn is volunteer Law Chairman.

**2. Identify all persons who made contributions to the Kings County Republican Committee during the 1994 election cycle. State the amount of each contribution and the date on which it was made.**

Response to Question 2:

The list of all donors is on file, as required, at the New York State Board of Elections and the New York City Board of Elections.

**3. Identify all persons who were involved in the decision to disburse funds of the Kings County Republican Committee on behalf of the Committee, just prior to the 1994 general election.**

Response to Question 3:

Arthur Bramwell, chairman.

**4. Identify all persons who were involved in the decision to disburse funds of the Committee to the Kings County Republican Committee, as reported on the Committee's 1994 30-Day Post-General Report. Identify all other persons who were aware of this decision.**

Response to Question 4:

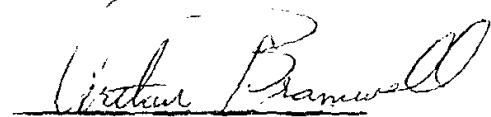
The question does not make sense. We cannot know whom the Commission is referring to when it asks who "at the Committee" was involved in the decision to disburse money to the KCRC. We will be happy to answer the question if this is clarified.

**5. Produce all documents which mention or which otherwise refer or relate to the disbursements to Jeffrey T. Buley, David R. Dudley, Mary F. Obwald, Gregory V. Serio, Luther Mook and the Kings Country Republican Committee, which were reported on the Committee's 1994 30-Day Post-General Report. Produce all documents which contain information regarding the persons to whom Jeffrey T. Buley, David R. Dudley, Mary F. Obwald, Gregory V. Serio, Luther Mook and the Kings County Republican Committee, were to distribute the funds disbursed to them. Identify all documents consulted in responding to this Subpoena and Order. Identify all individuals, not otherwise identified in response to any of the above questions, who have knowledge or information related to the answers to the above questions.**

Response to Question 5:

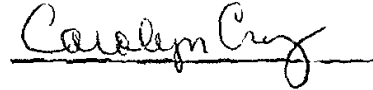
This question also appears directed to a Party other than the KCRC. As best as I can answer, no documents referring to the named individuals are in the possession of the KCRC. We referred to the check that is attached in responding to the subpoena. No individuals not otherwise identified herein have knowledge or information relating to the answers to the above questions.

I swear that the proceeding statements are true to the best of my knowledge, information and belief.



Arthur Bramwell

SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of August, 1997.



Notary Public

My Commission Expires: August 31, 1999

CAROLYN CRUZ  
Notary Public, State of New York  
No. 41-4837583  
Qualified in Queens County  
Commission Expires Aug. 31, 1993

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